

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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XUE HUI ZHANG  
YUE HUA CHEN & GUI YONG ZHANG  
Plaintiff

-against-

**NOTICE OF MOTION**

ICHIBAN GROUP LLC.,  
ICHIBAN FOOD SERVICES INC.,  
d/b/a Ichiban Japanese and Chinese Restaurant  
CHEN & JU, INC. d/b/a Takara, DAVID IP,  
LIPING JU, and TYNG QUH JU

CASE NO: 1:17-CV-148 [MAD/TWD]

Defendants,

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SIRS/MESDAMES :

**PLEASE TAKE NOTICE** a motion pursuant to FLSA §216(b) and FRCP Rule 54 and NDNY Local Rule 7.1, will be made as set forth below:

JUDGE: Hon. Mae A. D’Agostino , District Court Judge

RETURN DATE/TIME: December 4, 2023 @ on submission unless oral argument is directed and scheduled by the Court.

COURTHOUSE: On submission unless oral argument is directed and scheduled by the Court. in accordance with the Rule 2D of the Individual Rules and Practices of the Hon. Mae A. D’Agostino revised 4/2020.

RELIEF REQUESTED: An Order Awarding and Directing Payment of Attorneys Fees, Costs and Disbursements to Defendants as prevailing party and Granting such other and further relief as the Court deems just fair and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Rule 7.1(b)(1) and the Text Orders of the Court (Dkts 303 & 305) Answering papers, (if any), including any cross motions, are to be served and filed on or before December 4, 2023 .

Respectfully submitted

Date: November 6, 2023

LATHAM, NEW YORK

/s/ Matthew J. Mann

Matthew J. Mann (Bar Roll 507018)

Mann Law Firm P.C.

Attorney for Defendants

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